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7 *Attorneys for Defendants*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 U.S. EQUAL EMPLOYMENT OPPORTUNITY  
11 COMMISSION,

12 Plaintiff,

13 v.

14 LUCINDA MANAGEMENT, LLC, et al.,

15 Defendants.

CASE NO: 2:17-cv-02458-MMD-GWF

**STIPULATION AND ORDER TO EXTEND  
TIME TO ANSWER OR OTHERWISE  
RESPOND TO COMPLAINT**

**(First Request)**

16  
17 Plaintiff U.S. Equal Employment Opportunity Commission, (hereinafter "Plaintiff") by and  
18 through undersigned counsel, and Defendants Lucinda Management, LLC, et al. ("Defendants"), by  
19 and through undersigned counsel, hereby stipulate and agree that: (1) the time in which Defendants  
20 may answer or otherwise respond (e.g. file a responsive pleading or motion) to the Complaint be  
21 extended until January 8, 2018; and (2) the time in which the Plaintiff may file its response to any  
22 motion responsive to the Complaint that may be filed by Defendants be extended until February 12,  
23 2018.

24 The Plaintiff's Complaint asserts sexual harassment and retaliation claims against nearly a  
25 dozen companies in Nevada and New York on behalf of three named plaintiffs and a class of  
26 claimants with allegations dating back as much as fifteen years. Given the scope of the allegations  
27 and size of the proposed class (as identified by the Plaintiff during previous communications),  
28 Defendants require additional time to prepare a pleading or motion responsive to the Complaint.

1 The Parties further mutually agree that the requested deadlines will avoid conflicts with the holiday  
2 season, including office closures and previously scheduled vacations. As such, good cause is  
3 provided for this request. In making this stipulation, the Parties each do not waive any of their  
4 respective legal or procedural rights, which are hereby preserved.

5  
6 Dated this 11th day of December, 2017.

Dated this 11th day of December, 2017.

7 U.S. EQUAL EMPLOYMENT  
8 OPPORTUNITY COMMISSION

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

9 /s/ *Nechole M. Garcia*

/s/ *Richard I. Dreitzer*

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16 **ORDER**

17 UPON STIPULATION OF THE PARTIES AND FOR GOOD CAUSE SHOWN, it is  
18 hereby ordered and adjudged:

19 1. The time in which Defendants may answer or otherwise respond (file a responsive  
20 pleading or motion) to the Complaint shall be extended until **January 8, 2018**;

21 2. The time in which the Plaintiff may file its response to any motion responsive to the  
22 Complaint that may be filed by Defendants shall be extended until **February 12, 2018**; and

23 3. The Parties' respective legal or procedural rights are hereby preserved.

24 IT IS SO ORDERED.

25  
26 Dated: 12/12/2017

  
UNITED STATES MAGISTRATE JUDGE